

# **Appendix H**

## **PUBLIC SCOPING COMMENT**

### **Montana Salinity Control Association, Jane Holzer, Program Director**

1. The delay in notifying states and counties of eligibility can lead to poor resource and economic management decisions. Water is usually more limiting than forage in drought conditions.

*SOLUTION:* Don't delay the decision to grant ECP status. Be cognizant of the ramifications of continued drought, and be aware that improved or normal rainfall for a short time period will not improve subsoil moisture and ground water recharge. Also be aware of the limited number of licensed well-drillers and contractors to install water developments in a large state, with low population like Montana. Many 2001 contracts expired because the work could not be completed in time.

2. Water improvement is not allowed on pastures that did not have a prior water supply or development. The water source(s) has to fail in order to qualify for ECP. In drought conditions, the pastures with water are more likely to be over-grazed and need rest than areas further from water. This concept does not really protect the natural resource.

*SOLUTION:* Think of ECP as a way to benefit the pastures in poor condition by resting it, even if it means new water development on other pastures. This would relieve the grazing pressure on regularly used pastures and allow better grazing management on other areas. If water hauling could qualify on pastures with no current water, it may be the best use of all resources and be quite inexpensive.

3. In Montana, stock water developed through ECP cannot be utilized for domestic uses. In many cases, a single well provides water to house, barn, sheds, and pastures. If the well fails for one, it fails for all. It may be a poor economic decision for a producer to invest dollars into a limited-use well, when domestic use may be needed to justify the 50% match. Ground water will be short for every use in a drought period, especially if it is a prolonged one.

*SOLUTION:* Allow incidental use of stock water for domestic use. This should be based on gallons used by stock and household, and perhaps not allow more than 50% household use on a yearly basis. Currently the use is determined by days used for each, while it should be based on total gallons used on a yearly basis for stock versus domestic. Stock will use significantly more water, especially in hot, dry weather, than domestic uses would ever require annually. Compare 30 cows drinking 20 gallons/day using 600 gallons per day versus a domestic household and the gallons used. The cost-share could be reduced by the percentage of household water used on a yearly basis. This concept should apply to EQIP water development also. Another option is just have the producer pay for the pipeline, etc. from the well to the house and have USDA cost-share the remaining portion. There is some indication that exceptions have been made in other states, so Montana USDA offices should be informed how this could work.

4. USDA will cost-share at 50% if the ECP practice meets NRCS specifications; however, USDA will cost-share at 64% for temporary systems if the specifications are not met. How does this make sense? It discourages producers from utilizing NRCS assistance and holistic planning.

*SOULTION:* USDA should look at the entire operation and work with producers to develop long-term solutions, probably at a higher cost-share rate than 50%. If NRCS specifications are used, then the cost-share should be 75%. At least in Montana, droughts are always going to be an issue. It would make better use of producers' and USDA's money to put in permanent solutions if at all possible rather than temporary 'quick fix' solutions.

### **Maryland Public Meeting Comments**

I'm Kelly Hereth. I'm a CED in Carroll County, Maryland. A lot of good comments from our farmers and participants pertaining to CRP, and since this is an opportunity to talk about the other conservation programs, our county is specifically administered ECP in '99, as well as this current year.

And I would certainly, as a manager in that office, and dealing with various programs, would like to see a system that is more responsive to our request when we get them. Particularly, when we have had collaborative ideas that are very sound and good from our soil conservations districts and farmers to implement new practices that may address drought emergency needs. And fortunately, we haven't had to administer any other disasters. But I would like to see improvements there. Overall, in talking about streamlining the process with the various conservation programs we have, so many of them are very similar practices. And granted, this is an internal problem, not necessarily a farm bill problem in implementing it. But it would be nice to see if we could, if I'm doing a side waterway under CRP or EQIP or what have you, why don't we just use that technical code. And that way it's the same no matter what. Likewise, try to get to a more uniform standard in identifying cost share rates. it could be different, the rate could be different in outer counties. I would like to be able to go from one county to the next and know that, you know, TS is a tree shelter. I don't care if I'm in Talbot County, Garrett or Carroll County. But it can have a different rate. If anything, I would like to see it mirror more of the EQIP system all across the board regardless of the conservation programs we're implementing. And in terms of what the gentleman had today back to CRP. We have seen it be very successful in our county when producers have taken a proactive step in talking with their landowners. We have overemphasized to the private organizations that have promoted this program that they must get the tenant involved first. They should be talking with them, because they are the ones who are directly impacted. That's it.

### **Gary Rogers, Caddo County, Oklahoma, FSA County Executive Director**

It is too difficult to administer ECP in its current fashion, especially if drought is the cause of loss. It has happened to us in the past that by the time you are eligible for assistance and have approval from Washington, it rains and then it's too late to do anything for producers. I suggest that an allocation be given to each state each year and as the required level of loss is had by producer(s), a county can request the use of those funds. Once funds are exhausted in a State, provisions could be made to move funds between States in cases where States didn't need them. We need to be timelier with our assistance and I believe this is one way it could be done. I realize there would be some hesitancy of States releasing their allocation until they were assured they would not need them. In States whose allocation had been depleted, counties could

continue to take applications and do the entire process and inform producers there is no guarantee they would receive any assistance or maybe partial assistance. Once the fiscal year was over and left over funds were determined, all the unfunded applications across the Nation could be sent to a central location for processing. The applications could then either be factored or funds allocated by some priority method. Thank you.